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TO: Springfield City Council and Planning Commission
FROM: Bob Parker
SUBJECT: OPPORTUNITY AREAS FOR EMPLOYMENT SITES AND REQUIREMENTS FOR UGB ALTERNATIVES ANALYSIS

This memorandum presents a brief description of state planning requirements for the modifications of Urban Growth Boundaries (UGBs). It also includes maps of lands outside the UGB, with a specific focus on 10 employment opportunity areas.

The objectives of this memorandum (and our January 12th meeting) are to provide the City Council and Planning Commission with:

- An overview of opportunity areas for employment
- Background information on the Alternatives Analysis

PRELIMINARY EVALUATION OF LANDS OUTSIDE THE SPRINGFIELD UGB

The draft economic opportunities and housing needs analyses both conclude that Springfield will need to expand its UGB to accommodate growth forecast for the 2010-2030 period. The exact acreage of the expansion is not yet known; it will depend on the types of land use efficiency measures the City adopts, as well as the specific areas that it chooses to expand into.

As a first step in the Alternatives Analysis, ECONorthwest worked with City staff to develop a series of maps showing characteristics of lands adjacent to the existing Springfield portion of the Metropolitan UGB.¹ The primary study area lands adjacent to the Springfield portion of the Metropolitan UGB. The following maps support this memorandum:

- Map 1: Aerial photo of study areas
- Map 2: Study area zoning (exceptions, marginal land, resource land)
- Map 3: Study area constraints

¹ The evaluation does not consider lands inside the Eugene portion of the Metropolitan UGB, or lands west of Interstate 5.

- Map 4: Study area soil class
- Map 5: Study area national wetlands inventory and hydric soils

POTENTIAL AREAS FOR EMPLOYMENT

The EOA concludes the City will need to add employment sites to the UGB. Chapter 5 of the EOA identifies a need for larger sites (>5 acres), and some very large sites (three sites >50 acres). Chapter 5 of the EOA also identifies site characteristics that are specific to different industries. Because of the need for larger sites, and the more specific siting characteristics, planners often start the alternatives analysis by identifying potential employment sites.

At its November meeting, the Technical Advisory Committee identified the following employment opportunity areas. This was largely a brainstorming session to conduct a first-cut analysis.

1. North Gateway Area
2. Hayden Bridge Area
3. North Springfield Highway Area
4. Far East Springfield Area
5. Wallis Creek Road Area
6. West Jasper/Jasper Bridge Area
7. Clearwater Area
8. South of Mill Race Area
9. Seavey Loop Area
10. Goshen Area

The map on the following page shows the approximate location of the employment opportunity areas. The Stakeholder Committee will discuss the sites at our next meeting scheduled for January 5th. We will summarize the Committee's comments at the beginning of the January 12th worksession.

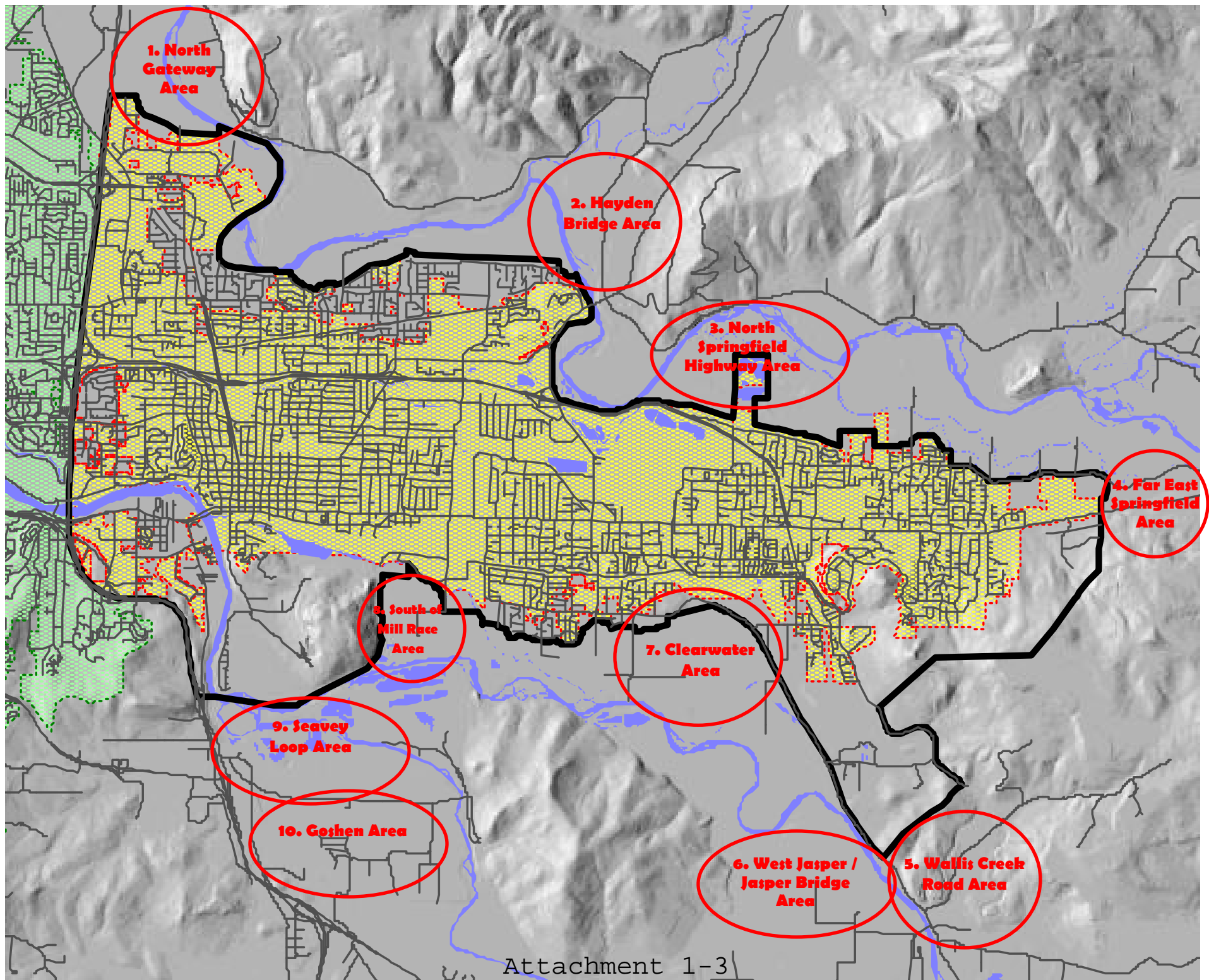


Table 1. Employment Opportunity Areas: Public Service Opportunities and Constraints

The following table summarizes public service opportunities and constraints based on information from the Springfield Technical Advisory Committee (TAC). The table is draft, and will be refined through additional discussions with staff and the TAC.

Area	Water	Wastewater	Stormwater	Transportation	Public Safety	Comments
1. North Gateway		May require pumping station Existing sewer in close proximity Potential higher cost than other areas	No developed system, wetlands, riparian areas and natural resources areas. Permitting required for new outfalls	No internal road network Access from existing farm roads Limited capacity at I-5/Beltline interchange Underpass/overpass provides potential access		Portions of the site are in the floodplain and floodway
2. Hayden Bridge		May require pumping across river, then Potential gravity flow Potential higher cost than other areas	No developed system Need to acquire base data	Access from Marcola Road Existing bridge in place		Some floodplain / floodway located west of Marcola Rd. Some steep slopes located east of Marcola Rd.
3. North Springfield Highway		May require a pump station for some areas – mostly gravity flow	wetlands, riparian areas and natural resources areas. Permitting required for new outfalls	Potential access to I-105 and High Banks Road		Portions of the site are in the floodplain and floodway
4. Far East Springfield		May require pumping station	Needs planning and infrastructure	Access from E. Main Street		Some steep slopes
5. Wallis Creek Road		Potential gravity flow area	Needs planning and infrastructure	Access from Jasper Rd. Existing bridge would likely need upgrade for increased traffic generation		Not a lot of floodplain area

Area	Water	Wastewater	Stormwater	Transportation	Public Safety	Comments
6. West Jasper/ Jasper Bridge		May require pump station	Needs planning and infrastructure	Access from Jasper Road		Large portion of rural residential / commercial land
7. Clearwater		Potential gravity flow area Existing sewer in close proximity New sewer extension planned along Jasper Road	Needs flood study Needs planning and infrastructure	Access from Jasper Road		Some floodplain along existing UGB Large portions without floodplain
8. South of Mill Race		Existing sewer in close proximity Potential gravity flow area	Needs flood study Needs planning and infrastructure Limited discharge opportunities	Access to S. 28 th St. & S. M St.		Existing SUB well fields in place Mostly publicly owned land
9. Seavey Loop	No existing water service	Need sewer extension from Glenwood Upgrades to existing pump station Potential gravity flow area	Needs flood study Needs planning and infrastructure Limited discharge opportunities	Limited capacity at I-5/30 th Street interchange Need for rail and river crossings Opportunities for rail access		Opportunities for parkland at river confluence area School capacity may be limited
10. Goshen		Potential gravity flow area Potential higher cost than other areas	Needs planning and infrastructure			

Table 2. Employment Opportunity Areas: Site Characteristics and Suitability

The following table summarizes the suitability for development by building type in each of the employment opportunity areas. The table also presents the site characteristics (identified in the economic opportunities analysis (EOA)) that make the opportunity area suitable. The building types identified in the EOA are: Warehousing and Distribution (W&D), General Industrial (GI), Office (Off.), Retail (Ret.), and Other Services (OS). The EOA identified need for sites 5 acres and larger in each of these building types.

Area	Suitability by Building Type					Site Characteristics that make the site suitable	Comments
	W &D	GI	Off .	Ret.	OS		
1. North Gateway	●	●	●	○	●	Potentially 50+ acre site(s) Located near I-5 interchange Relatively flat Surrounding uses compatible with warehousing and industrial uses Visible from I-5 or arterial streets	Potential demand for land in the North Gateway area (according to Jack Roberts) Willing multiple owners (according to Jack Roberts)
2. Hayden Bridge	○	○	●	○	●	Sites 5+ acres Access to arterial streets Slopes less than 15% Surrounding uses are compatible with office, retail, and other service uses Visible from arterial or collector streets	High amenity area presents opportunities for corporate head quarters or other commercial
3. North Springfield Highway	○	○	●	○	○	Sites 5+ acres Type of street access Slopes less than 15% Surrounding uses are compatible with office, retail, and other service uses	
4. Far East Springfield	○	○	●	○	○	Sites 5+ acres Access to arterial streets Areas with slopes less than 15% Surrounding uses are compatible with office, retail, and other service uses Visible from arterial or collector streets	

Area	Suitability by Building Type					Site Characteristics that make the site suitable	Comments
	W & D	GI	Off .	Ret.	OS		
5. Wallis Creek Road	⊗	●	⊙	⊗	⊗	Potentially 50+ acre site(s) Type of street access Slopes less than 15% Surrounding uses are compatible with industrial, office, retail, and other service uses	
6. West Jasper/ Jasper Bridge	⊗	●	⊙	⊗	⊗	Potentially 50+ acre site(s) Type of street access Slopes less than 15% Surrounding uses are compatible with industrial, office, retail, and other service uses	
7. Clearwater	⊗	⊗	⊙	⊙	⊙	Sites 5+ acres Access to collector and neighborhood streets Slopes less than 15%	
8. South of Mill Race	⊗	⊗	⊙	⊙	⊙	Sites 5+ acres Access to collector and neighborhood streets Slopes less than 15% Surrounding uses are compatible with office, retail, and other service uses	
9. Seavey Loop	●	●	⊙	⊗	⊙	Potentially 50+ acre site(s) Located near I-5 interchange Relatively flat Surrounding uses compatible with warehousing, industrial, office, and other service uses Rail access	Opportunity for denser industrial development Commercial firms have expressed interest in this area (according to Jack Roberts)

Area	Suitability by Building Type					Site Characteristics that make the site suitable	Comments
	W & D	GI	Off .	Ret.	OS		
10. Goshen	●	●	⊗	⊗	⊗	Potentially 50+ acre site(s) Located near I-5 interchange Relatively flat Surrounding uses compatible with warehousing, industrial, office, and other service uses	May meet regional industrial land need

Note: ● Highly suitable ● Somewhat suitable ⊗ Unsuitable

POLICY CONTEXT FOR ALTERNATIVES ANALYSIS

This section provides a brief overview of statewide planning goal 14 (Urbanization) and related statutes and administrative rules that govern UGB expansions. These include Goal 14, ORS 197.298, and OAR 660-024. .

Goal 14: Urbanization

The purpose of goal 14 is:

To provide for an orderly and efficient transition from rural to urban land use, to accommodate urban population and urban employment inside urban growth boundaries, to ensure efficient use of land, and to provide for livable communities.

The goal requires that incorporated cities establish UGBs. Moreover, any UGB amendments must be a collaborative process that involves cities and counties and must be adopted by both the city and the county.

Goal 14 requires change of urban growth boundaries be based on the following:

- (1) Demonstrated need to accommodate long range urban population, consistent with a 20-year population forecast coordinated with affected local governments; and
- (2) Demonstrated need for housing, employment opportunities, livability or uses such as public facilities, streets and roads, schools, parks or open space, or any combination of the need categories.

Goal 14 includes two other need provisions that are relevant: (1) “in determining need, local governments may specify characteristics, such as parcel size, topography or proximity, necessary for land to be suitable for an identified need”; and (2) “prior to expanding an urban growth boundary, local governments shall demonstrate that needs cannot reasonably be accommodated on land already inside the urban growth boundary.” In summary, needs can include land characteristics and cities must consider whether needs can be met within the existing UGB before expanding the UGB.

This is germane to the first steps in the Alternatives Analysis. For example, the City could choose to identify certain areas such as lands with steep slopes or lands in federal ownership as not meeting identified needs.

Priority of lands

ORS 197.298 establishes a priority of lands for consideration in UGB expansions:

- (a) First priority is land that is designated urban reserve land under ORS 195.145, rule or metropolitan service district action plan. (Springfield does not have urban reserve areas; therefore, this does not apply).
- (b) If land under paragraph (a) of this subsection is inadequate to accommodate the amount of land needed, second priority is land adjacent to an urban growth boundary that is identified in an acknowledged comprehensive plan as an exception area or nonresource land.

Second priority may include resource land that is completely surrounded by exception areas unless such resource land is high-value farmland as described in ORS 215.710.

(c) If land under paragraphs (a) and (b) of this subsection is inadequate to accommodate the amount of land needed, third priority is land designated as marginal land pursuant to ORS 197.247. (Lane County is a marginal land county; therefore, this applies to Springfield).

(d) If land under paragraphs (a) to (c) of this subsection is inadequate to accommodate the amount of land needed, fourth priority is land designated in an acknowledged comprehensive plan for agriculture or forestry, or both.

In short, there are three priorities that apply to Springfield. First priority is exception areas or non-resource lands, and may include resource land that is completely surrounded by exception areas unless such resource land is high-value farmland. Second priority is marginal land. Third priority is resource land.

Goal 14 provides some additional guidance on boundary locations with consideration of the following factors:

- (1) Efficient accommodation of identified land needs;
- (2) Orderly and economic provision of public facilities and services;
- (3) Comparative environmental, energy, economic and social consequences; and
- (4) Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB.

These factors provide direction on selection of lands within the priority scheme and also outline some reasons why lower priority lands may be part of an expansion area if they may better address these factors than lands in higher priority categories. The ORS 197.298 priority scheme is relatively rigid, but the Goal 14 factors allow some flexibility. ORS 197.298 and Goal 14 allow some exceptions to the priority scheme based on “special” needs. For example, if a city identifies a need for lower cost housing that can only be developed on flat land, then that may be a reason to include some resource lands before, or together with, exceptions lands. Such an exception would require additional justification and must be supported by solid technical analysis.

Division 24: The Urbanization Rule

In 2006, the Land Development and Conservation Commission adopted amendments to the Urbanization Rule (OAR 660-024) that were intended to clarify the process of amending UGBs. We have referred to this rule, and some of the safe harbors it establishes, in work on the housing and economic elements.

Subsection 0050 clarifies the procedures for land inventories and local government response to land deficiencies. OAR 660-024-0050(4) requires cities to amend UGBs in response to land deficiencies:

“If the inventory demonstrates that the development capacity of land inside the UGB is inadequate to accommodate the estimated 20-year needs... the local

government must amend the plan to satisfy the need deficiency, either by increasing the development capacity of land already inside the city or by expanding the UGB, or both, and in accordance with ORS 197.296 where applicable. Prior to expanding the UGB, a local government must demonstrate that the estimated needs cannot reasonably be accommodated on land already inside the UGB. Changes to the UGB must be determined by evaluating alternative boundary locations consistent with OAR 660-024-0060.”

Based on the Economic and Housing Elements, preliminary land needs have been identified. In the draft Urbanization Element presented to the Committee, the findings of the buildable lands inventory and land needs analysis are that some of the need will be met within the UGB, but that additional buildable land will be needed.

Boundary Location Alternatives Analysis

OAR 660-024-0060 requires cities conduct an “Alternatives Analysis” when considering a UGB amendment. The alternatives analysis (the part of the UGB review process that we are now moving into) requires all lands adjacent to the existing UGB be reviewed (e.g., a ring around the UGB). Relevant sections of OAR 660-024-0060 specify the following:

- (1) When considering a UGB amendment, a local government must determine which land to add by evaluating alternative boundary locations. This determination must be consistent with the priority of land specified in ORS 197.298 and the boundary location factors of Goal 14, as follows:
 - (a) Beginning with the highest priority of land available, a local government must determine which land in that priority is suitable to accommodate the need deficiency determined under 660-024-0050.
 - (b) If the amount of suitable land in the first priority category exceeds the amount necessary to satisfy the need deficiency, a local government must apply the location factors of Goal 14 to choose which land in that priority to include in the UGB.
 - (c) If the amount of suitable land in the first priority category is not adequate to satisfy the identified need deficiency, a local government must determine which land in the next priority is suitable to accommodate the remaining need, and proceed using the same method specified in subsections (a) and (b) of this section until the land need is accommodated.
 - (d) Notwithstanding subsection (a) through (c) of this section, a local government may consider land of lower priority as specified in ORS 197.298(3).
 - (e) For purposes of this rule, the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under section (5) of this rule, as well as other provisions of law applicable in determining whether land is buildable or suitable.

...

- (3) The boundary location factors of Goal 14 are not independent criteria. When the factors are applied to compare alternative boundary locations and to determine the UGB location, a local government must show that all the factors were considered and balanced.
- (4) In determining alternative land for evaluation under ORS 197.298, "land adjacent to the UGB" is not limited to those lots or parcels that abut the UGB, but also includes land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency.
- (5) If a local government has specified characteristics such as parcel size, topography, or proximity that are necessary for land to be suitable for an identified need, the local government may limit its consideration to land that has the specified characteristics when it conducts the boundary location alternatives analysis and applies ORS 197.298.
- (6) The adopted findings for UGB adoption or amendment must describe or map all of the alternative areas evaluated in the boundary location alternatives analysis. If the analysis involves more than one parcel or area within a particular priority category in ORS 197.298 for which circumstances are the same, these parcels or areas may be considered and evaluated as a single group.
- (7) For purposes of Goal 14 Boundary Location Factor 2, "public facilities and services" means water, sanitary sewer, storm water management, and transportation facilities.
- (8) The Goal 14 boundary location determination requires evaluation and comparison of the relative costs, advantages and disadvantages of alternative UGB expansion areas with respect to the provision of public facilities and services needed to urbanize alternative boundary locations. This evaluation and comparison must be conducted in coordination with service providers, including the Oregon Department of Transportation with regard to impacts on the state transportation system. "Coordination" includes timely notice to service providers and the consideration of evaluation methodologies recommended by service providers. The evaluation and comparison must include:
- (a) The impacts to existing water, sanitary sewer, storm water and transportation facilities that serve nearby areas already inside the UGB;
 - (b) The capacity of existing public facilities and services to serve areas already inside the UGB as well as areas proposed for addition to the UGB; and
 - (c) The need for new transportation facilities, such as highways and other roadways, interchanges, arterials and collectors, additional travel lanes, other major improvements on existing roadways and, for urban areas of 25,000 or more, the provision of public transit service.